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Attorneys for Plaintiffs
Temujin Labs Inc., a Delaware corporation, and
Temujin Labs Inc., a Cayman Islands corporation.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TEMUJIN LABS INC., a Delaware
corporation, and TEMUJIN LABS INC., a
Cayman Islands corporation,

Plaintiffs,

v.

TRANSLUCENCE RESEARCH, INC., a
Delaware corporation, BENJAMIN
FISCH, CHARLES LU, BENEDIKT
BÜNZ, NATHAN MCCARTY,
FERNANDO KRELL, PHILIPPE
CAMACHO CORTINA, BINYI CHEN,
AND LUOYUAN (ALEX) XIONG, and
DOES 1-20, inclusive,

Defendants.

CASE NO.: 4:21-cv-09152-JST

**DECLARATION OF CRAIG A. HANSEN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ENLARGEMENT OF TIME UNDER
FEDERAL RULE OF CIVIL PROCEDURE
6(b)**

[N.D. Cal. Civil Code Local Rule 6-3]

Courtroom: Courtroom 6, 2nd Floor
Judge: Hon. Jon S. Tigar

Complaint Filed: November 24, 2021

1 I, Craig A. Hansen, declare as follows:

2 1. I am the managing attorney of the Hansen Law Firm P.C. (“HLF”), counsel for
3 Plaintiffs Temujin Labs, Inc., a Cayman Islands corporation (“Temujin Cayman”), and Temujin
4 Labs, Inc., a Delaware corporation (“Temujin DE”) (collectively, “Plaintiffs”). I have personal
5 knowledge of the matters stated in this Declaration and, if called upon as a witness, would
6 competently testify to them.

7 2. HLF retained Pacific Coast Legal Services (“PCLS”) to help HLF effect service
8 upon the defendants in this action. The named defendants in this action are Translucence
9 Research, Inc. (“Translucence”), Benjamin Fisch, Charles Lu, Benedikt Bünz, Nathan McCarty,
10 Fernando Krell, Philippe Camacho Cortina, Binyi Chen, and Louyuan (Alex) Xiong. HLF asked
11 PCLS to run skip traces on the individual defendants residing in the U.S.

12 3. Attached as Exhibit 1 is a true and correct copy of the Declaration of Service filed
13 in this action as ECF No. 12 regarding service upon Translucence.

14 4. Attached as Exhibit 2 is a true and correct copy of the Proof of Service filed in this
15 action as ECF No. 14 regarding service upon Nathan McCarty.

16 5. Attached as Exhibit 3 is a true and correct copy of the Proof of Service filed in this
17 action as ECF No. 14-1 regarding service upon Benjamin Fisch.

18 6. Charles Lu and Benjamin Fisch are defendants and cross-complainants in another
19 action filed by Plaintiffs in Santa Clara County Superior Court, Case No. 20CV372622, *Temujin*
20 *Labs Inc. v. Ariel Abittan, Benjamin Fisch, Charles Lu, and Does 1-10* (the “State Court Action”).
21 Counsel for Charles Lu and Benjamin Fisch recently filed an *ex parte* application relating to
22 service upon two individual cross-defendants of Lu and Fisch’s cross-complaint in the State Court
23 Action represented by the same counsel, HLF. Through subsequent discussions related to that *ex*
24 *parte* application, counsel for Lu and HLF entered into a stipulation whereby counsel for Lu
25 would accept service for Lu in this action, and HLF would accept service for the individual cross-
26 defendants in the State Court Action. A true and correct copy of that stipulation, entitled
27 “Stipulation and [Proposed] Order Regarding Service of and Response to Cross-Complaint,” is
28 attached hereto as Exhibit 4.

